

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD DALE SANDERS,

Defendant.

Case No. 23-CR-354-SEH

United States' Sentencing Memorandum

Over several months, Ronald Dale Sanders coerced, enticed, and sexually abused 14-year-old MV. Sanders asserted his position of power as MV's teacher to manipulate both MV and her family. Sanders' conduct, history, dangerousness, and the other 18 U.S.C. § 3553 factors all support a sentence of 420 months imprisonment followed by lifetime supervised release.

Facts

In July 2023, 14-year-old MV became Facebook friends with her old 6th grade teacher, 54-year-old Ronald Sanders. At that time, Sanders had left Miami, Oklahoma and moved to Belton, Missouri where he taught at a middle school around there and MV was about to start 8th grade. Soon after adding each other on Facebook, they started to message each other. What started as a normal student and teacher relationship quickly divulged into inappropriate sexual conversations. By August, MV and Sanders considered themselves to be in a romantic relationship and

they communicated over text, phone calls, facetime, and Snapchat. The topic of their conversations was often sexual and flirty in nature. Sanders asked for and received nude pictures of MV's body and they would masturbate with one another on Facetime. Sanders asked MV to have sex with him and on multiple occasions Sanders told MV to go buy a douche to prepare. Sanders also engaged in controlling and manipulative behavior towards MV such as telling MV to wear modest clothing to cover up his "merchandise" and frequently lashed out at her if she did not text him back fast enough. Sanders frequently fought with MV and accused her of cheating on him leading MV to get upset. During this time, MV's parents were separated and getting a divorce. Additionally, Sanders purchased gifts for MV including a necklace, a personalized bracelet, lingerie, and diamond ring with Sanders' initial on it.

Starting at the end of August, Sanders began driving from Missouri to Oklahoma to see MV. At this point, Sanders started to incorporate himself in MV's life in a more public way under the guise that he was her math tutor. Sanders befriended MV's dad, went to dinner with her family, hung out with her at Miami football games, and even emailed her principal and school counselor. This led to the counselor to become concerned and question MV about Sanders. Sanders told MV to delete evidence of them talking and to deny it, which MV did. MV's school surveillance caught Sanders meeting up with MV one afternoon in front of her school when he was in town for a funeral. Sanders was blatant in his pursuit of MV, they openly sat next to each other at Miami High School football games, messaged

during school hours, and Sanders had a picture of MV as the background on his phone.

Sanders drove to Oklahoma on multiple separate weekends and always convinced MV to sneak out of her house to see him. If MV indicated difficulty seeing him, Sanders would lash out and threaten to end things. Usually, MV would wait until her father and siblings went to bed before sneaking out and getting in Sanders's car parked in the alley. Once in the car, MV and Sanders performed oral sex on one another and had vaginal sex on several different occasions. During one encounter, Sanders took a picture in the back of his car that showed his penis touching MV's bare vagina area. Sanders later sent this image to MV over text.

On October 14, 2023, Sanders drove from Missouri to Oklahoma to meet up with MV that night. Once MV thought everyone was asleep, she snuck out to Sanders' car. Sanders had purchased a six pack of Smirnoff branded alcoholic drinks and a sex toy for MV to use with him. At one point, Sanders requested that MV go inside and charge the sex toy so they could use it, but she refused. That night, Sanders played a drinking game with MV so she would have to chug alcohol and played truth or dare. Before anything further could happen, MV's dad noticed that she was gone and that there was a car in the alleyway. MV's dad went outside and pulled his car behind Sanders and saw MV walking away from the car. Sanders then backed into MV's dad's car and sped off. MV's father followed in pursuit. As MV's parents called police, Sanders called MV and told her to deny that it was him. Sanders was eventually pulled over by police and arrested on unrelated alcohol and driving

charges. Officers noted that there were two open bottles of Smirnoff Ice and a sex toy in the car.

A few days later, Sanders messaged MV's friend and told her that he needed to speak with MV. MV and Sanders communicated over her friend's Instagram account and over email. At the end of the message, Sanders told her to delete their conversation.

Argument

- A. The nature and circumstances of Sanders's sexual abuse supports a sentence of 420 months imprisonment to reflect the seriousness of the crime, promote respect for the law, and provide just punishment for the offense.**

The nature and circumstances of Sanders's offenses are egregious. Sanders used his position of power as a teacher to take advantage of vulnerable child. Over the course of several months, Sanders sexually and emotionally abused, and manipulated MV to fulfill his own sexual desires. Sanders even went as far to befriend MV's father to gain easier access to MV. Sanders openly pursued MV and drove across state lines multiple times to engage in sexual acts with her. Sanders made MV take pictures of her body to send to him and took a photo of their genitals touching. Sanders also convinced MV to stay quiet about their relationship and told her he would go to prison "forever" if anyone found out. Although MV is safe from Sanders' abuse, she is unquestionably left with the long-term impacts of his abuse.

Despite Sanders conduct, he did come in and immediately take responsibility for his actions and did not drag MV through a trial. Due to his early plea, MV did not

have to meet with the Government or relive the abuse she suffered. However, Sanders's abuse toward MV should not be disregarded just because he took responsibility, and a lengthy prison sentence is necessary to promote respect for the law. Over the course of a few months, Sanders groomed, manipulated and sexually abused MV and convinced her they were in a genuine relationship. The guidelines have shown that crimes against children are one of the most serious crimes. Due to Sanders' early acceptance of responsibility while considering the seriousness of the offense, a term of imprisonment of 420 months is an appropriate and just sentence.

B. Sanders' history and characteristics support a sentence of 420 months imprisonment and is necessary to provide adequate deterrence to Sanders and others.

While he has no significant criminal history, Sanders used social media to target a past student, groomed her, and drove across state lines in the middle of the night to sexually abuse her. Sanders' relentless efforts to have sex with MV shows the danger he poses if released. "Congress [has] explicitly recognized the high rate of recidivism in convicted sex offenders, especially child sex offenders." *United States v. Allison*, 447 F.3d 402, 405-06 (5th Cir. 2006); *see also United States v. Pugh*, 515 F.3d 1179, 1201 (11th Cir. 2008) ("As Congress has found and as we have discussed, child sex offenders have appalling rates of recidivism and their crimes are under-reported."). Sanders has shown he is unable or unwilling to control his sexual urges toward children and the lengths he will go to fulfill those urges. Sanders was 54 years old when he abused MV and before this had no similar conduct or allegations of sexual abuse. Sanders was, however, relentless in his efforts to fulfill his sexual desires once

he set his mind to it. However, his willingness to take accountability and acceptance shows a difference from other defendants who force their victims to relive their abuse at trial. This supports a sentence of 420 months imprisonment.

Conclusion

Sentencing Sanders to 420 months imprisonment addresses the § 3553(a) factors, provides just punishment, promotes respect for the law, emphasizes the seriousness of the offense, and, hopefully, prevents Sanders from continuing to target and abuse children for his own sexual gratification.

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Certificate of Service

I hereby certify that on the 2nd day of July 2025, I electronically submitted the foregoing document to the Clerk of Court using the ECF System for filing and notification was sent to the following recipient:

John Connelly
Counsel for Defendant

/s/ Alicia N. Hockenbury

Alicia N. Hockenbury
Assistant United States Attorney